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Attorneys for Plaintiff, Cross Defendant, Third Party Defendant, Counter Defendant and Counter Claimant KFD Enterprises, Inc., a California corporation dba Norman's Dry Cleaner, and Third Party Defendant Kenneth Daer

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

KFD ENTERPRISES, INC., a
California corporation dba Norman's Dry
Cleaner,

Case No.: 3:08-CV-04571 MMC

VS

Plaintiff,

CITY OF EUREKA, et al.

Defendants.

**STIPULATION TO EXTEND RESPONSE
DEADLINES REGARDING
ENVIRONMENTAL RESOLUTION INC.'S
MOTION FOR SUMMARY JUDGMENT;
PROPOSED ORDER**

Date: November 16, 2012
Time: 9:00 a.m.
Dept: Honorable Maxine M. Chesney

AND RELATED COUNTER AND CROSS- CLAIMS

Plaintiff, Cross Defendant, Third Party Defendant, Counter Defendant and Counter Claimant KFD Enterprises, Inc. and Third Party Defendant Kenneth Daer (collectively "KFD"), Defendant, Counter Claimant and Third Party Plaintiff City of Eureka ("Eureka"), and Defendant and Third Party Defendant Environmental Resolutions, Inc. ("ERI"), hereby stipulate to:

1. Extend the time providing KFD an additional seven days to file and serve an opposition to ERI's motion for summary judgment filed in this action on September 27, 2012 as

1 document no. 546. Whereas pursuant to Local Rule 7-3, the original deadline to file and serve an
2 opposition was October 11, 2012, KFD will now have up to and including October 18, 2012 to file
3 its opposition.

4 2. Extend the time providing Eureka an additional seven days to file and serve an
5 opposition to ERI's motion for summary judgment filed in this action on September 27, 2012 as
6 document no. 547. Whereas pursuant to Local Rule 7-3, the original deadline to file and serve an
7 opposition was October 11, 2012, Eureka will now have up to and including October 18, 2012 to file
8 its opposition.

9 3. Extend the time providing ERI additional time to file and serve its respective replies.
10 Whereas pursuant to Local Rule 7-4, a reply memorandum is due seven days after the filing of the
11 opposition, ERI will now have fourteen days after the filing of KFD and Eureka's respective
12 oppositions to file its reply.

13 The Parties have not previously requested an extension of time.

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16 Dated: October 1, 2012

GREBEN & ASSOCIATES

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/s/ Jan Greben
JAN A. GREBEN
JEFF COYNER
Plaintiff, Cross Defendant, Third Party Defendant,
Counter Claimant KFD ENTERPRISES INC., a
California corporation dba Norman's Dry Cleaner; and
Third Party Defendant KENNETH DAER

22 Dated: October 1, 2012

GORDON & REES, LLP

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/s/ George Acero
KRISTIN N. REYNA
GEORGE A. ACERO
Defendant and Third Party Defendant
ENVIRONMENTAL RESOLUTIONS, INC.

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1 Dated: October 1, 2012

DAVIDOVITZ & BENNETT LLP

2 /s/ Charles Bolcom

3 MORIS DAVIDOVITZ

4 CHARLES BOLCOM

5 Defendant, Third Party Plaintiff, Counterclaimant

6 CITY OF EUREKA

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8 **IT IS HEREBY ORDERED.**

9 Dated: October 1, 2012

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11 HONORABLE MAXINE M. CHESNEY
12 UNITED STATES DISTRICT JUDGE

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